

May 16, 2005

David Schmidt
E3649 550 Av
Menomonie, Wi 54751

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USDA NATIONAL
ORGANIC PROGRAM

2005 MAY 23 P 4: 06

NOSB
1400 Independence Av SW
Washington, D.C. 20250

Dear NOSB,

Since I wrote last, it appears you are making some very good progress in changing the organic rules regarding livestock operations. It is very good to see this group taking such a determined interest in something that is so very important to agriculture and good, safe food for the people of the United States.

A proposal has been submitted that ruminant livestock "shall have the goal of providing grazed feed greater than 30% dry matter intake on a daily basis during the growing season but not less than 120 days." The proposal goes on to talk about exceptions to this 120 day rule.

My suggestion is to make this grazing rule something of which we can be proud. I propose that we establish a minimum grazing period of 160 days. The 120 rule is a start, but is inadequate.

My wife and I graze 32 Jersey cows plus 4 steers on our 55 acres of certified organic land. We also graze 1,500 broiler chickens and 300 layers on this land. This may not seem like much of an accomplishment, but our ground is sandy and tends to dry out very quickly.

Our farm is situated at 45 degrees North Latitude and there are probably not many farms north of our land. I understand there may be as many as 50% of organic farmers who would be hard pressed to even graze 120 days because of the size of their operations, that is, too many cattle for too little land.

The whole tradition of farming deals with allowing our livestock access to pastures that are adequate for most of their production. In the last years of American farming we have gone away from that idea and have ended up with overwhelming confinement. Requiring 120 days of grazing, although this is a start, makes it look like we continue confinement with a bit of grazing.

We envy the farmers in southern Wisconsin and southern Minnesota, in all of Iowa, Illinois and Nebraska and all of the other states where climate allows some very long grazing periods. Even on this poor piece of ground, we can get close to 200 days of grazing. Our cows are only in the barn to be milked and the rest of the year is spent outside. If handled properly and allowed access to shelter, cows will actually find the most comfortable place in their environment. They

can also be supplemented with forages while in the pastures to extend the grazable feed and grazing periods. This is easy to do.

I encourage you to consider the farmer who has the daily struggle with their chosen profession, but also to consider the sustainability of hauling huge amounts of feed to the barn and hauling huge amounts of manure away from the barn. I would also encourage you to consider the impact this type of farming has on our water, our air and land.

We have a terrific opportunity with these pasturing requirements. We must also consider the impact of any decision on the quality of food we will be selling to the consumers. In these requirements, we can also help guarantee these ruminants a healthy, stress-free life.

Sincerely,

A handwritten signature in cursive script, appearing to read "David Schmidt". The signature is fluid and stylized, with a large initial "D" and a long, sweeping underline.

David Schmidt